

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
DIVISION

FILED
RICHARD W. NACLL
CLERK OF COURT

2020 JUL 20 PM 2:36

2 U.S. DISTRICT COURT
SOUTHERN DIST. OHIO
EAST DIV. COLUMBUS
Judge Morrison

Jacqueline Giebell

(Enter Above the Name of the Plaintiff in this Action)

vs.

MAGISTRATE JUDGE JOLSON

Heartland of Dublin Nursing Facility / HER Manor care

(Enter above the name of the Defendant in this Action)

If there are additional Defendants, please list them:

COMPLAINT

I. Parties to the action:

Plaintiff: Place your name and address on the lines below. The address you give must be the address where the court may contact you and mail documents to you. A telephone number is required.

Jacqueline m. Giebell

Name - Full Name Please - PRINT

P.O. Box 76

Street Address

Wytheville, Va. 24382

City, State and Zip Code

276-228-5648

Telephone Number

cell-phone 276-613-4638

If there are additional Plaintiffs in this suit, a separate piece of paper should be attached immediately behind this page with their full names, addresses and telephone numbers. If there are no other Plaintiffs, continue with this form.

Defendant(s):

Place the name and address of each Defendant you listed in the caption on the first page of this Complaint. This form is invalid unless each Defendant appears with full address for proper service.

1. Heartland at Dublin
Name - Full Name Please
4075 West Dublin Grandville Rd., Dublin OH
Address: Street, City, State and Zip Code 43017
2. _____
3. _____
4. _____
5. _____
6. _____

If there are additional Defendants, please list their names and addresses on a separate sheet of paper.

II. Subject Matter Jurisdiction

Check the box or boxes that describes your lawsuit:

☒ Title 28 U.S.C. § 1343(3)
[A civil rights lawsuit alleging that Defendant(s) acting under color of State law, deprived you of a right secured by federal law or the Constitution.]

☐ Title 28 U.S.C. § 1331
[A lawsuit "arising under the Constitution, laws, or treaties of the United States."]

☒ Title 28 U.S.C. § 1332(a)(1)
[A lawsuit between citizens of different states where the matter in controversy exceeds \$75,000.]

☒ Title 42 United States Code, Section 1395i-3
[Other federal status giving the court subject matter jurisdiction.]

*Requirements for
and assuring quality
of care in skilled nursing
facilities*
*Requirement
Relating to
Residents Rights (Privacy)
telecommunications*

*Also involved a
State law & deprived of
visits*

III. Statement of Claim

Please write as briefly as possible the facts of your case. Describe how each Defendant is involved. Include the name of all persons involved, give dates and places.

Number each claim separately. Use as much space as you need. You are not limited to the papers we give you. Attach extra sheets that deal with your statement claim immediately behind this piece of paper.

(papers attached behind)

1. Negligence per se ---(see exhibit D) violations of Nursing Home Reform Act is Negligence per se.

Ms. Giebell , former caregiver of Shiskin Wu, reported abuse of same patient to heartland of Dublin. During the process of reporting the abuse to the police, heartlands administrator, Cody Bown, tells the police that Ms. Giebell , wouldn't be allowed on the premises of heartland at Dublin, citing that the power of attorney, didn't want her there.(See exhibit A) The police then made suggestions to the wu family, that led to Ms. Giebell's telephone rights being taken away, which was a violation of the Nursing Home Reform Act. (exhibit E) The power of attorney law, is state, the Nursing Home Reform Act, is Federal. So Ms. Giebell had a state law used against her, that violated her Federal rights.

2. Gross Negligence ----(See attached form)
3. Malice-----(See attached form)
4. Attach the following complaints to civil complaint

Title 18, chapter 73 , section 1510 obstruction of criminal investigations

Title 18, of the same, section 1513, retaliation against witness

Legal precedence in the form of civil case Jalowy vs. Friendly Home, Inc. (see exhibit V)

5. Witness Statement

Gross Negligence

Ms. Giebell, former caregiver, and friend to Mr. Wu, lists Ohio Statute, 3721.10 part d, (exhibit f), as qualifying for 'sponser' status to speak on behalf of Mr. Wu, and also bring suit. Ms. Giebell submits the following text conversation with Keui Wu, Mr. Wu's power of attorney, calling Ms. Giebell, Mr. Wu's friend, as a type of 'show cause proof'. This is (exhibit g)

Ms. Giebell who took care of Mr. Wu in Virginia, healed up 6 weeks of marks on him, (2—3 week segments) and reported said marks to her boss, Mr. Jen Wu. Mr. Jen Wu, was then taken back to Ohio, approximately 5 weeks later, and placed in the Heartland of Dublin facility.

On a visit on Jan. 16, 2018, (exhibit h), Ms. Giebell observed marks on Mr. Wu identical to the mark on Mr. Wu in Virginia. Thinking that Mr. Wu would be coming back to Virginia soon, Ms. Giebell who was on her way out the door, when said mark was discovered, did not report abuse of Mr. Wu, at that time. Ms. Giebell also observed more marks on Mr. Wu, in May and also the July, and August trips to visit him.

On June 15, 2018, power of attorney, Keui Wu, tried to cut off Ms. Giebell's visits of Mr. Wu. At that time, Heartland intervened in behalf of Ms. Giebell's visiting rights. At this time, Ms. Giebell also reported the observation of abuse to Cody Brown, administrator of Heartland of Dublin. He RECKLESSLY disregarded Ms. Giebell's abuse statement, that included information that a family member was abusing Mr. Wu. Because she stated only family members would have had access to Mr. Wu both in Virginia and Ohio, because Ms. Giebell's boss, Mr. Jen Wu kept the door locked, and only family members or employees could get in to Mr. Wu. (See exhibit i) Ms. Giebell then reported said abuse to Heartland's home office, who refused to let Ms. Giebell file anymore complaints until the administrator, Cody Brown, had time to act. But Cody Brown, failed to act, so then Ms. Giebell reported the abuse to Cody Brown's boss, Mr. Jason Holefelder. Mr. Holefelder, went on a vacation in July 2018, after receiving Ms. Giebell's letter. During the time he was gone, things got so bad with Mr. Wu, that Ms. Giebell filed a complaint with the Ohio Dept. of Health. When Mr. Holefelder returned, he did an assessment on Mr. Wu and after a phone conversation with Mr. Holefelder, Heartland RECKLESSLY, denied any abuse of Mr. Wu, calling the marks on him, 'skin discolorations'. (found in exhibit b). Heartland did this despite NEVER being implicated in the actual abuse of Mr. Wu. Ms. Giebell who has personal knowledge of the marks, disagrees that they are only 'skin discolorations'.

After talking to the nurses on Aug. 2nd, 2018, Ms. Giebell found out that Mr. Wu's family had been sitting in his room all day. And Ms. Giebell could not reach Mr. Wu by telephone. Ms. Giebell got upset and called the Dublin police. During the course of reporting the abuse to them, the officer told Ms. Giebell that there was another report involving Mr. Wu. On Aug. 3rd, Ms. Giebell got the 1st full police report (exhibit a). She was very upset, and spoke to a police officer regarding the telecommunications suggestion of Officer Jones. At that time Ms. Giebell spoke again to Mr. Holefelder, who denied he knew about the of Ms. Giebell visits, by the administrator. Ms. Giebell insisted that he immediately call Cody

brown to fix the problem. Ms. Giebell also insisted that he call the police and speak to them. He didn't want to, but said ms. Giebell could have an officer call and speak to him. So I called the officer back, and on aug.4, sat, he told me he had spoken to Mr. holefelder and assured ms. Giebell there would be no more trouble out of the telecommunications suggestion.

On Friday, aug. 3rd, ms giebell also spoke to investigator, sgt kraye, to have him re-open the case on mr. wu. He requested that ms. Giebell document the abuse in virginia and make a report. When ms. Giebell went to the police department in wytheville to make a report, they refused, and said the statute of limitations was up, which was a lie. The chief of police showed up, wearing civilian clothes, and very dirty appearance, and hid behind the door and listened to another officer speak. He also refused to help. Sgt Kraye allowed ms. Giebell to document the abuse in virginia and ms. Giebell had it notarized.

On Monday, aug. 6, the investigator sent officer jones back to photograph the marks on Mr. Wu. (exhibit j) Later that day, ms. Giebell, received a call from an officer traves telling her that mr. wu's family had come in to make a telecommunications complaint. He was friendly and seemed like it wouldn't progress any further and promised to call back. When ms. Giebell didn't hear from him, she called back (aug.7), At that time, officer traves was very hateful, and went on and on about Mrs. Wu being the power of attorney and not wanting ms. giebell to contact Mr. wu. Ms. giebell told him about her rights, which he totally ignored, and then gave her the verbal warning and threatened her and told her not to call mr. wu, or she would be charged with telephone harassment. Ms. Giebell, also asked him to provide her with some sort of a written statement that he gave her the warning, and he also refused. He also advised her that mr. wu's family had taken mr. wu's cellphone, which was also a nursing home reform act violation.

So ms. Giebell called back to talk to the first officer who told her she would not have any problems out of the telecommunications suggestion, and he was off duty. In fact ms. giebell was so upset, that the person she talked to, made an incident report about it, (exhibit c) which proves ms. Giebell's story. She also talked to a lady officer named sgt. Rice. Sgt rice was very hateful and threatened ms. giebell. Ms.giebell told her that the communications warning was not a no contact order, as it only involved electronic devices. But she disagreed with her, and told her that the police specifically acted on the state law. She also made a big deal about the fact that they followed the state law of the power of attorney and also disregarded the federal law.

At this point, I would like to submit exhibit k -2921.03, intimidation, ohio revised code, which states that it is a 3rd class felony to threaten a witness, in the state of ohio. So that means when cody brown, officer traves, and officer rice, made threatening remarks to ms. Giebell, or about her, they all committed felonies, according to ohio law.

Ohio revised code 2921.03 intimidation, also states that the person who intimidates a witness, is also liable in a civil action to pay the attorneys fees of those harmed by that action in the event they bring suit. So if this court should deem it necessary that ms. Giebell have an attorney to speak in behalf of mr. wu, then please have one assigned, and bill his fees to heartland.

Also important to note, that because ohio law clearly states that heartland is liable for ms. Giebell's attorney fees, ms. Giebell is NOT liable for theirs.

Malice

In June of 2019, Ms Giebell obtained a partially redacted version of some of the Ohio Dept of Health survey reports. Ms. Giebell found and observed patient #10's report, who she believes to be Mr. Shis-kin Wu. Ms. Giebell offers the following exhibits as a type of 'show cause' proof. Exhibit L-mr Wu's death certificate matching the same time of death as patient #10. Text messages, and pages from Mr. Wu's care journal, showing that Ms. Giebell prepared Mr. Wu's medications, (Exhibit M) proving Ms. Giebell had first hand knowledge of Mr. Wu's medication, and texts and pages from the journal showing medications that match those of patient #10. (Exhibit N)

According to patient #10's report, (Exhibit O) Mr. Wu was signed up into the hospice program on 8/5 2018, AFTER the 2nd investigation started. Hence before the abuse was reported, Mr. Wu was NOT on hospice.

After speaking with Officer Traves, Ms. Giebell called Mr. Holfelder, who granted Ms. Giebell rights to visit Mr. Wu on Aug. 18, 2018. During this conversation, Ms. Giebell made Mr. Holfelder fully aware that the police had placed Ms. Giebell under 'false detainment' with regards to the phone rights, and that they had ALSO included the nursing home room phone in that, which was a violation of the nursing home reform act. Mr. Holfelder did nothing to help Ms. Giebell regain the telephone rights.

During the next few weeks, Ms. Giebell sent complaint letters to officers, trying to get out of the 'false detainment' of the police (Exhibit P). Eventually Ms. Giebell spoke to the chief of police's secretary, Becky, and then to the chief of police, himself. Then Ms. Giebell was contacted on Thursday, Aug. 30, 2018, by another officer acting on the authority of the chief, dismissing the warning of Officer Traves. He said that the legal dept. of the police had sided with Ms. Giebell because Mr. Wu was competent.

According to patient #10's Ohio Dept of Health's survey report, (Exhibit O) Mr. Wu fell on Aug. 22, and was taken to the hospital. The report does not say when Mr. Wu came back, OR what condition he was in when he arrived. But it does say that when he came back, he was NOT on hospice. It also says that for some reason, Mr. Wu was mysteriously put back on hospice on Sept. 2nd, and even though he had handled being on hospice fine from 8/5 till he fell, he somehow started dying the next day on 9/3, and continued dying until close to midnight on 9/4. The day Mr. Wu was placed on hospice, 9/2 was only 3 days (the same weekend) after Ms. Giebell was able to get out of the 'false detainment' of the police.

When Ms. Giebell spoke to the officer that dismissed the warning of Officer Traves, he made some stipulations regarding Mr. Wu. He said that Mr. Wu might sometime in the near future be declared incompetent. The subject matter of Mr. Wu being declared incompetent was also in the mentioned in the 2nd police report. (Exhibit B).

This is indeed upsetting because in the first police report, (Exhibit A) there is facts jotted down on a piece of paper, 1 being that Mr. Wu had a BIMS of 6, meaning that he was NOT incompetent. Yet it was heartland's intention to have a doctor declare him incompetent (Exhibit B), even though the first police report (Exhibit A) provides proof that WAS competent.

So it is ms. Giebell's observation and opinion that mr. wu was signed up into hospice as both a retaliation and to 'dispose' of him. And to rid themselves of the abuse scandal. Incidentally, it is important to note, that heartland was never implicated in the actual abuse of mr. wu. So they did this to an innocent man unnecessarily. That is Malice.

And how exactly does someone who is competent suddenly become incompetent? And how does a doctor, mysteriously declare someone incompetent that is already competent? Could it be that heartland used their hospice to incapacitate mr. wu? There seems to be circumstantial evidence to support this. That is Malice.

Ms. Giebell would like to submit (exhibit Q) , a magazine article that says that there are multiple allegations and complaints filed stating that, hcr manorcare signed patients up to hospice unnecessarily. And also falsified records. Mr. Wu is actually proof of this.

It is important to note, that the police dept. specifically dismissed the warning because mr. wu was COMPETENT. So mr. wu had rights . Yet heartland, continued on purpose to 'attack' this right, by saying they would have mr. wu declared incompetent by a doctor, even though he was already competent. And this violated ms. Giebells rights as well. That is Malice.

Title 18, chapter 73, section 1510, obstruction of criminal investigations

In exhibit b, heartland makes several statements that are lies concerning mr. wu's stay at heartland, in an effort to discredit ms. Giebell, the witness, to the police. In the ohio jurisprudence 3rd edition, vol. 27, criminal law, section 1412, page 403, (exhibit s), it says that to communicate false information to any person constitutes obstruction of justice.

1. Heartland falsifies time Mr. Wu was at their facility. Ms giebell has included mr wu's care journal from virginia, (exhibit t), and a text message for almost everyday ms giebell worked with mr. wu, (exhibit u). To show cause and prove this was a lie.
2. Heartland has also obstructed justice by indication the abuse marks on mr wu were only 'skin discolorations'. Even their professionals have participated in this. Proof of which was found in exhibit o, patient #10's report that states that a nurse practitioner called the marks on mr. wu, 'normal aging process'.

Title 18—chapter 73,-1513 retaliating against witness

Heartland administrator cody brown, told the police ms. Giebell would be restricted from the property. In case Jalowy vs the friendly home, inc. , it specifically states that the administrator barred someone from the nursing home, and that it was retaliation for reporting abuse. So ms. Giebell offers this legal precedence as proof that barring somone from a nursing home constitutes retaliation.

IV. Previous lawsuits:

If you have been a Plaintiff in a lawsuit, for each lawsuit state the case number and caption.
(Example, Case Number: 2:08-cv-728 and Caption: John Smith vs. Jane Doe).

<u>Case Number</u>	<u>Caption</u>
CL01000109-00	Jackie Giebell vs. Roger Jarvis
_____	_____ vs. _____
_____	_____ vs. _____

V. Relief

In this section please state (write) briefly exactly what you want the court to do for you. Make no legal argument, cite no case or statutes.

Ms. Giebell requests 200,000 in
punitive damages

Ms. Giebell requests case be reopened
on Mr Shiskin Wu

I state under penalty of perjury that the foregoing is true and correct. Executed on

this 16 day of July, 2020.

Jackie Giebell
Signature of Plaintiff

①

Full Witness Statement

I, Jacqueline Giebell, swear the testament hereby given by myself in this statement is correct, and true to the best of my knowledge and ability.

I started taking care of Mr. Shis-kin Wu on Nov 29, 2016 & worked till Jan 4, 2017. Because I was not in contact with Ken Wu at that time, there is no text journal for that time period, and the first week of the care journal is also missing. My Boss, Mr. Jen Wu wanted me to go to Ohio and take care of Mr Wu, full time. At that time I was unable to do that, & Mr. Wu went back to Ohio & stayed at his house until Friday, Jan 13, 2017, when he fell & was placed in the heartland at Dublin facility.

When Mr Wu left, my Boss Jen Wu, told me that, Mr Shis' Wu would be coming back to Virginia at some point & time. I visited Mr Wu in March, 2017 (exhibits) at the heartland of Dublin facility. Then on May, 12, 2017, Shis-kin Wu became my patient and under my care in Virginia. I have provided exhibits T and U, as show cause proof of this.

(2)

On July 11, 2017, I came to work & heard yelling and slapping noises coming from Mr Wu's window. I called to my boss, whose voice I recognized. I tried to investigate what was going on in the room. (Exhibit W) provides a diagram & photos to make the following statements easy to understand. Mr Wu's window is approximately 10 feet to the right of the front door. But it is far above the ground. But if you go farther out in the yard, you can get a little more elevation. So that's what I did. But even with jumping up I still was unable to see inside. Soon after the noise stopped & I got inside. The door to Mr Wu's room was shut. When I opened the door, I saw Mr Wu sitting on the bed & tears on his face. My boss, Jen Wu was squatted in front of Mr. Shis Wu. I do not know if anyone was in the room besides my boss before that or not. However, because I went far out into the yard to try to see in the window, I wouldn't have been able to see anyone pass by the door.

(3)

Sometime after this, a dark purple bruise came up on Mr. Wu that I had never seen before. It took about 3 weeks to heal. After about a week or so it started to heal & itchy, leaving only the 'outside marks', I call healed up marks. Sometime around the 2nd week of August, the same mark came up on Mr. Wu, except this time it was on BOTH sides of his stomach. At this point I confronted my Boss, Jen Wu, and told him I thought that Mr. Wu was being hurt by someone & that he should find out what was going on. I made it clear to him that I didn't want to see anymore marks on Mr. Wu. 3 days later he told me that Mr. Wu was going back to the heartland at Dublin facility. And 5 weeks later, on Sept 20, 2017, he left and was placed in heartland sometime after that.

Even though I didn't want Mr. Wu to go. I believed he would be safe in Ohio, so I just let him go, without interference.

I visited Mr. Wu on halloween, 2017 at the heartland at Dublin facility. So he definitely wasn't at Jen Wu's as the police report states, after Oct. 10. Also took videos of Mr. Wu speaking english.

(4)

Due to bad weather, I wasn't able to visit Mr. Wu again until the middle of January, 2018. Mrs. Keni Wu wasn't happy about me visiting him again & wanted me to come later. On the last day of my visit, January 16, 2018, I was preparing to leave and Mr Wu pulled the curtain divider, exposed the right side of his stomach (left side facing him). Then I saw the identical dark purple bruise, as I saw here in Virginia. Fearing the Wu family had some sort of surveillance, I tried not to make a big deal of it, or notice it, much. But I was shocked!! Since it had been almost 4 months since Mr Wu left Virginia, I thought he might be coming home soon, so I did not report the abuse, cause I hoped he would be coming back to Virginia. (Exhibit H) is text messages from the January trip.

On my March trip to visit Mr Wu, I did not see any new marks on him. It is unknown for sure if he had been hit & the marks healed since it was over 2 months since I had been there. (And the bruise takes only 3 weeks to heal.)

Mrs. Keni Wu did not come to see me in March & since it had been now 6 months Mr Wu was at heartland, I began to think it unlikely he would come back to Virginia.

(5)

During the march trip I found out that Mr. Wu had fallen in the bathroom, so I befriended the lady across the hall from him & asked her to keep a special eye on him.

Late April, things changed with Mr. Wu. Apparently, someone had dropped his phone in the shower, and disabled it. It became increasingly difficult to get ahold of Mr. Wu. I was in touch with my friend across the hall & she was able to get messages to Mr. Wu for me.

In May, I decided to make an unannounced visit to Mr. Wu. I had called him & he started crying & I was very concerned. Well I arrived on May 14, 2018, all hell broke loose. Mrs. Wu showed up & threw a fit on me. Mr. Wu's strong hand (right one) was droopy & just hanging down. His heart beat was slow, & he seemed like he had fluid in his lungs. I reported this to the nurses right away. Mrs. Wu came in & said it wasn't any of my business & it wasn't my job. Because of the altercation with Mrs. Wu, I had to speak with head nurse Carol. Carol was nice to me & assured me of keeping visiting rights with Mr. Wu, also gave me special rights to have the nurses help Mr. Wu to answer the phone. But this was short lived, because the next day Mr. Wu was transferred downstairs.

(6)

Mr Wu's room downstairs could not be seen into from the other side of the hall. So this would have made it easier for someone to abuse him.

When I left in May, I began to consider moving to Ohio. Mr Wu's abuse had not stopped. For the next month I continued to call Mr Wu everyday to check on him. The nurses were a big help at first.

On June 15 I had a hard time getting ahold of Mr. Wu. For some reason Keni Wu had tried to cut off my visits, etc... with Mr Wu. I had to talk to the director of nurses, with Keni in the room, and later talked to Cody Brown, administrator as well. It is unknown if Keni was present during that phone call or not, but it was during this call that I reported the abuse of Mr. Wu to heartland. At this meeting, Cody Brown did not believe me about the abuse of Mr. Wu, and did not take any action to help Mr. Wu of any kind. But he did preserve my visiting rights at that time. But he revoked the former privilege of the nurses helping me to answer Mr Wu's phone. Mrs. Wu had replaced Mr Wu's phone with one that was hard for him to answer & not only that, kept the phone on a desk, instead of his front pocket, as before.

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During the next several weeks, I struggled to call Mr Wu everyday. Mr Wu's new room's signal was so bad, only a Verizon phone would work, so I bought one & brought it with me on my July trip. July, 3rd & 24th 2018, This time nobody showed up to bother me. Mr Wu's health had greatly improved. And his 'droopy hand' was back to normal. I helped Mr Wu into the bathroom & saw 'healed up marks' on both sides of his stomach. The one side I had not seen marks since last August. So Mr Wu's abuse ^{was} ongoing.

After my July trip, getting a hold of Mr Wu by phone became very difficult. Even though I left the phone for Mr Wu, somebody stuck it in the drawer & turned it off. When I called & asked them to turn it back on, they didn't. The nurses even said that Mr Wu didn't want to talk to me. I got a call from him on one of those days.

Mrs. Wu had become extremely belligerent. Yelling at the nurses for helping me and harassing Mr. Wu by standing over him & giving him distress & making him say things like I call too much, etc... He was stammering & afraid sounding.

One time I called & got a nurse, the nurse said that Mr Wu was sleeping so hard, she couldn't even shake him awake. As Mr. Wu's caregiver, I have first hand knowledge to know that Mr. Wu NEVER slept that hard before. At that point I suspected Mr. Wu was being drugged & made a complaint to the Ohio Dept of Health.

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During the last week of July, I began to look for a volunteer to go into Mr Wu's room to take a cell-phone so I could call & check on him everyday. I made multiple calls, I called Soup Kitchens, the Catholic nuns, the Jews, the volunteer people & still came up empty handed. When I was finally able to find someone, she was turned away & given the excuse that Mr Wu's family didn't want him to have any visitors. (A NHRA violation) Also proved heartland was grossly negligent because I told them that a family member was hurting Mr Wu, so by siding with them over Mr. Wu's NHRA rights, Heartland actually became an accessory after the fact.

Because Cody Brown failed to act on the abuse, I contacted his boss, who came & did an assessment on Mr. Wu on July 31, 2018. On August 1st Cody Brown called the police to report Mr Wu's abuse. During that visit Cody Brown violated me & Mr Wu's rights and told the officer responding that he would ^(poa) not let me visit Mr Wu cause Mr Wu's family didn't want. At that moment, Cody Brown violated NHRA rules, and made heartland at Dublin an accessory after the fact. Also made heartland at Dublin guilty of gross negligence.

The officer made suggestions to the Wu family & I was falsely detained by the police for 3 weeks, and unable to protect Mr. Wu.

9

I was allowed to visit Mr. Wu on Aug 18, 2018, Saturday. I came with my father who drove. I was very stressed about this afraid the police would show up & cause a scene & my father might be shot. When I got there I had about an hour alone with Mr. Wu & then Mr Wu's family showed up & harassed me & stared at me the rest of the time I was there. Eventually I left & told Mr Wu I would see him in a couple weeks & kissed him on the cheek & left, and never saw him again.

I have spent the last 2 years fighting for justice ~~for~~ for Mr. Wu. I have made MULTIPLE complaints. 3 to Doh, Nursing board, medical board, 2 U.S Attorney complaints, Belts Complaint & more all to NO Avail. Came back unsubstantiated, even when it pertained to other people, etc.... Even the U.S attorneys didn't do their job. Said I should give up cause attorneys cost money, yet neglected to tell me Ohio law says that because Heartland threatened me & I brought suit, they are now liable to pay my attorneys fees. How did he get a job anyway, he's supposed to know Ohio law? Apparently he doesn't. Heartland had a duty to protect Mr. Wu, yet failed to act. Not only did they fail to act, but they caused my rights to be violated & I was placed under false detainment so I couldn't protect Mr. Wu, that's a whole nuther ball game, and that is the reason for this suit.

jacqueline Lickel